



- Room 1 - Location of dry cleaning operations and access to outdoor drum storage. Approximately 100 linear feet of asbestos insulation falling from pipes. Location of tetrachloroethylene found in sub slab and estimated to be 500 cubic yards.
- Room 2 - Corridor connecting pipes between Room 1 and Room 3. Asbestos coated pipes and pipe insulation on floor. Approximately 100 linear feet of pipe insulation in room.
- Room 3 - Location of laundry machines, electrical transformers, completely collapsed roofing and approximately 400 linear feet of asbestos insulation falling off pipes. Room 3 is adjacent to warehouse space.
- Room 4 - Shipping area containing approximately 300 linear feet of asbestos insulation falling from pipes, roof is partially collapsed and in poor condition.
- Room 5 - Offices containing laboratory chemicals of paints and caustic detergents. Interconnected with Site buildings.
- Boiler Room - Boilers and compressors in room adjacent to Room 4. Approximately 100 linear feet of asbestos pie insulation in poor condition.
- Chimney - 100 foot high brick chimney used for boiler room and for possible incineration of laundry scraps and boiler venting. An estimated 100 cubic yards of ash and residue contains tetrachloroethylene, arsenic up to 184ppm and lead up to 2160ppm.

Material	Quantity	Storage Method	Primary Hazard	Statutory Source for Designation as a Hazardous Substance
Lead	100 y ³ in chimney	None. Soil beneath dry cleaning area, and ash around chimney.	Toxic, Inhalation and ingestion	2
Arsenic	100 y ³	None. Soil beneath dry cleaning area, and ash around chimney.	Toxic, inhalation and ingestion	2
Asbestos	~1,000 linear feet and 500 cubic yards of debris	None. Hanging from piping and scattered throughout the building in debris piles	Carcinogen	2, 3
Tetra-chloroethylene	est. 500 y ³ in soil, 100 y ³ in chimney	None. Soil beneath dry cleaning area, and ash around chimney.	Toxic	2, 3, 4
Tetra-chloroethylene	2 drums	30 gallon drums	Toxic	2, 3, 4
Flammable Liquids - Paints and solvents, propane cylinders	~50 containers	1 pint - 5 gallon pails	Flammable (D001)	4
Corrosive Detergents and Cleaners	~50 containers.	1 pint - 5 gallon pails	Corrosive (D002)	4

Notes: 1 - Clean Water Act (CWA) Section 311(b)(4)

2 - CWA Section 307(a)

3 - CAA Section 112

4 - RCRA Section 3001

1. Proposed action description

The following activities are proposed to address the immediate threats to human health and the environment posed by hazardous substances, or pollutants, or contaminants present at the Site.

- a. **Stabilization** - All containers that are open or of questionable integrity will be over-packed or transferred into new containers. Containers will be placed in compatible waste groups and removed from areas containing asbestos.
- b. **Sampling** - All containers, transformers, soil contamination areas, and UST will be sampled for disposal analysis parameters. Where possible, composite samples will be taken to reduce the total amount of samples analyzed. Areas of asbestos contamination will be sampled to confirm and/or delineate the presence of asbestos in Site debris.
- c. **Analysis** - All samples will be evaluated for compatibility. The samples will be analyzed for disposal parameters, anticipated to be the full toxicity characteristic leaching procedure (TCLP) analysis.
- d. **Disposal** - Upon receipt of disposal analysis, waste profiles will be completed and sent to disposal facilities for acceptance. Compatible materials will be sent to off-Site disposal facilities in compliance with EPA's Off-Site Disposal Rule.
- e. **Asbestos Abatement** - Some of the areas at the Site which contain drums and other containers of hazardous substances are situated in highly contaminated asbestos areas. During the stabilization and sampling phase, areas that contain the greatest concentrations of asbestos will be addressed prior to demolition actions. An asbestos abatement contractor will abate the asbestos from these areas. Once these areas are abated, workers will proceed with hazardous substance stabilization, sampling and disposal.
- f. **Demolition of Site buildings** - The Site buildings are interconnected and are in a severe state of deterioration. The collapsed building sections have mixed with asbestos from piping and have caused asbestos-containing material (ACM) debris. The ACM debris is situated in collapsed building sections and requires removal. This can only be accomplished by building demolition. Stone and steel from the building demolition will be recycled and wood will be sent for landfill. ACM debris will be sent off-Site for landfill. In addition, demolition of Site buildings are required to remove soil contamination beneath Room 1.
- f. **Removal of Soil Contamination** - Once the buildings are removed, soil will be removed from beneath Room 1 and in areas where additional soil contamination may exist. These areas may include the scavenged transformer area and the UST. As part of the soil investigation and removal, if impacts to the adjacent excised buildings are suspected, additional soil testing and subsequent removal may be required on adjacent property.